

United States Dist Court
Middle Dist of Penna.

WM Branch
Plaintiff

V
40 Russian et; al.

1:CV-001728

(Judge Rambo)

FILED
HARRISBURG, PA

Brief in support of motion
for Discovery

MAR 21 2002

MARY E. D'ANDREA CLERK
Per MM
Deputy Clerk

if it please's the court Here come's
William Branch under Rules of Discovery asking this
Honorable Court to grant me Discovery. Rule 26; 65 PS. § 66.1

The issue of Parole statistics is one of Public
interest in that the Parole Board is charged to obey
Constitution in it decisions. in my Complaint I have
charged the D.O.C. staff with conspiracy in Exhibit
AA-1 Page 5 7 paragraph m wish states that the issue
concerning me being Recommended for Parole are none
compliance with my Prescriptive Program Plan I did
complete the none admitter Program they want me to admit
Guilt.

I maintain that the Records will show that this is
not the case in Parole Grants and denials in fact the
Records will show Racism as the Reason for Parole
grants and denials.

under Penna. Right to Know act & freedom of infor-
mation ~~and~~ ask this Court to Grant me Discovery
Kemp 481 US 279 (1987); Cass 6th Cir. No. 91-1213 9/25/01. Ct
citing: Discovery on Racial Discrimination in Federal Death Penal

Date 3-17-02

William Branch CF.
PO Box 256
Waymart Pa 16872

PROOF OF SERVICE

I, the undersigned, verify that I have served a copy of this petition by U.S. postage paid mail to:

William Branch CF3786

3-17-02

MOTION TO PROCEED IN FORMA PAUPERIS

I, the undersigned, move this Honorable Court for an order permitting me to proceed In Forma Pauperis. I had previously been granted In Forma Pauperis status. My financial situation has not changed. I am still unable to pay the cost of the said proceedings.

VERIFICATION

I, the undersigned, verify that the above statements are true and correct and that any false statements herein are made subject to Title 18 Pa.C.S.A. section 4904 relating to unsworn falsification to authorities.

Dated: _____

*State attorney General
Office
Harrisburg, PA 17120
(ccg mailing)*

Respectfully submitted

*US Middle Dist
PO Box 983
Harrisburg, PA 17108
(Judge Rambo)*

S.C.I. Waymart
P.O. Box 256
Waymart, PA 18472-0256